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February 19, 2008

By US Postal Service:

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

By Commercial overnight delivery:

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
9300 East Hampton Drive
Capitol Heights, MD 20743

re: EB Docket No. 06-36

Dear Ms. Dortch:

Please find enclosed an original and five (5) copies of the CPNI Compliance Certificate and the Accompanying Statement requirements for Monroe Telephone Company, TRS 802008.

Please return a stamped copy in the enclosed SASE. If there are any questions, I may be reached on 503-612-4400.

Sincerely,

Dorrene Benthin
Senior Consultant

Enclosures

Copies to:
Federal Communications Commission
Enforcement Bureau
445 - 12th Street SW
Washington, DC 20554

Best Copy & Printing Inc.
445 - 12th Street, Suite CY-B402
Washington, DC 20554

No. of Copies rec'd 0+4
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Annual 47 C.F.R. §64.2009(e) CPNI Certification

EB Docket 06-36

Received & Inspected

FEB 20 2008

FCC Mail Room

Annual 64-2009(e) CPNI Certification for 2007

Date filed: February 19, 2008

Name of Company Covered by this certification: Monroe Telephone Company

Form 499 Filer ID: 802008

Name of signatory: John T. Dillard

Title of signatory: President

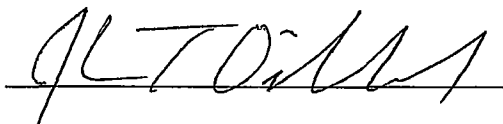
I, John T. Dillard, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. §64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

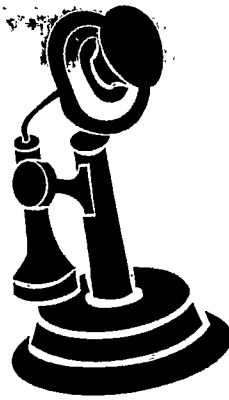
The company has not taken any action against data brokers in the past year. To the best of our knowledge, no pretexters have attempted to access CPNI at our company.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed



John T. Dillard



Monroe Telephone Company

CPNI
POLICIES & PROCEDURES
MANUAL

Approved by:

[REDACTED]

President/ Date

Effective: [REDACTED]

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Definitions

This Monroe Telephone Company CPNI policy manual relies on the following definitions:

- (1) **Account information.** "Account information" is information that is specifically connected to the customer's service relationship with Monroe Telephone Company, including such things as an account number or any component thereof, the telephone number associated with the account, or the bill's amount.
- (2) **Address of record.** An "address of record," whether postal or electronic, is an address that the carrier has associated with the customer's account for at least 30 days.
- (3) **Affiliate.** The term "affiliate" means a person that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another to own an equity interest (or the equivalent thereof) of more than 10 percent.
- (4) **Breach.** When a person, without authorization or exceeding authorization, has intentionally gained access to, used, or disclosed CPNI.
- (5) **Call detail information.** Any information that pertains to the transmission of specific telephone calls, including, for outbound calls, the number called, and the time, location, or duration of any call and, for inbound calls, the number from which the call was placed, and the time, location, or duration of any call.
- (6) **Communications-related services.** The term "communications-related services" means telecommunication services, information services typically provided by Monroe Telephone Company and services related to the provision or maintenance of customer premises equipment.
- (7) **Customer.** A customer of Monroe Telephone Company is a person or entity to which Monroe Telephone Company is currently providing service.
- (8) **Customer Premises Equipment (CPE).** The term "customer premises equipment (CPE)" means equipment employed on the premises of a person (other than a carrier) to originate, route, or terminate telecommunications.
- (9) **Customer Proprietary Network Information.** The term "customer proprietary network information" means –
 - (A) information that relates to the quantity, technical configuration, type, destination, and amount of use of a telecommunications service subscribed to by any customer of Monroe Telephone Company, and that is made available to Monroe Telephone Company solely by virtue of the Monroe Telephone Company-customer relationship; and

- (B) information contained in the bill pertaining to telephone exchange service or telephone toll service received by a customer of Monroe Telephone Company; except that such term does not include subscriber list information.
- (10) **Data Broker.** A person or business that offers for sale CPNI obtained by pretexting.
- (11) **Data Bureau.** A company that provides information technology services to telecommunications carriers, specifically billing services and customer record detail. Data bureaus typically have access to call detail CPNI (see Independent contractor).
- (12) **FCC -** The acronym "FCC" refers to the Federal Communications Commission.
- (13) **Independent contractor.** Any person or business that may provide services to telecommunications carriers. This includes, but is not limited to; joint venture partners and independent contractors for the purposes of marketing communications-related services to a customer; billing services; customer record detail; central office equipment vendors; engineering; and construction. Independent contractors typically have access to call detail and/or non-call detail CPNI.
- (14) **Information services typically provided by Monroe Telephone Company.** The phrase "information services typically provided by Monroe Telephone Company" means only those information services that are typically provided by Monroe Telephone Company, such as Internet access or voice mail services. Such phrase "information Services typically provided by telecommunication carriers," as used in this manual, shall not include retail consumer services provided using an Internet website (such as travel reservation services or mortgage lending services), whether or not such services may other wise be considered to be information services .
- (15) **Joint venture partners** (short term alliances of telecommunications carriers) **and independent contractors** (see Independent contractors) **for the purposes of marketing communications-related services to a customer.** A specific subset of persons or businesses that provide marketing services to telecommunications carriers. Any marketing use of CPNI by this subset must have opt-in approval by the affected customers.
- (16) **Local exchange carrier (LEC).** The term "local exchange carrier (LEC)" means any person that is engaged in the provision of telephone exchange service or exchange access. Such term does not include a person insofar as such person is engaged in the provision of a commercial mobile service under section 332(c) of TA-96, except to the extent that the Commission finds that such service should be included in the definition of such term.

- (17) **Opt-in approval.** The term "opt-in approval" refers to a method for obtaining customer consent to use, disclose, or permit access to the customer's CPNI. This approval method requires that Monroe Telephone Company obtain from the customer affirmative, express consent allowing the requested CPNI usage, disclosure, or access after the customer is provided appropriate notification of the Monroe Telephone Company's request consistent with the requirements.
- (18) **Opt-out approval.** The term "opt-out approval" refers to a method for obtaining customer consent to use, disclose, or permit access to the customer's CPNI. Under this approval method, a customer is deemed to have consented to the use, disclosure, or access to the customer's CPNI if the customer has failed to object thereto within the waiting period described after the customer is provided appropriate notification of Monroe Telephone Company's request for opt-out consent consistent with the rules.
- (19) **Password.** The term "password" means a secret word or sequence of alpha and numeric characters which is used to limit access to a customer's account to authorized individuals.
- (20) **Pretexting.** The term "pretexting" means the practice of pretending to be a particular customer or other authorized person in order to obtain access to that customer's call detail or other private communications records.
- (21) **Readily available biographical information.** "Readily available biographical information" is information drawn from the customer's life history and includes such things as the customer's social security number, or the last four digits of that number; mother's maiden name; home address; or date of birth.
- (22) **Subscriber List Information (SLI).** The term "subscriber list information" means any information –
(A) identifying the listed names of subscribers of Monroe Telephone Company and such subscribers' telephone numbers, addresses, or primary advertising classifications (as such classifications are assigned at the time of the establishment of such service), or any combination of such listed names, numbers, addresses, or classifications; and
(B) Monroe Telephone Company or an affiliate has published, caused to be published, or accepted for publication in any directory format.
- (23) **Telecommunications company or carrier.** The terms "Monroe Telephone Company," or "carrier" shall have the same meaning. - For CPNI this term shall include provision of interconnected VoIP service.

- (24) **Telecommunications service.** The term "telecommunications service" means the offering of telecommunications for a fee directly to the public, or to such classes of users as to be effectively available directly to the public, regardless of the facilities used.
- (25) **Telephone number of record.** The telephone number associated with the underlying service, not the telephone number supplied as a customer's "contact information."
- (26) **Valid photo identification.** The term "valid photo identification" means an official identification document issued by a federal or state governmental agency that identifies the holder of the document that includes a photograph of sufficient clarity to positively identify the holder of the document.

Company Policy Regarding CPNI

Monroe Telephone Company has chosen not to use CPNI data that enables the company or its affiliates to market additional products or services. Accordingly, Monroe Telephone Company's personnel are trained not to use CPNI for such purposes. Because CPNI is not used for marketing purposes, Monroe Telephone Company has established the appropriate safeguards for this type of treatment (non-use) of CPNI data. These safeguards include documentation of this policy in this manual and training of Monroe Telephone Company personnel with regard to non-use of CPNI data.

In this effort, the Company must follow all applicable FCC rules as contained in Subpart U – Customer Proprietary Network Information – of Part 64 of Title 47 of the Code of Federal Regulations. Specific Monroe Telephone Company procedures are as follows:

BUSINESS CUSTOMER EXEMPTION

Business customers that are served only by a dedicated Monroe Telephone Company representative as the primary contact are exempt from these CPNI rules.

ACCESS TO CPNI DATA

Access to CPNI data is limited to employees or entities with the requisite proper authorization as allowed by FCC rules. Any employees or entities with CPNI access must operate under policies that require nondisclosure of confidential information. Improper use or disclosure of CPNI is subject to disciplinary action up to and including termination.

Marketing Programs

All marketing material used by Monroe Telephone Company will be reviewed by the President.

No Monroe Telephone Company marketing campaigns are related to CPNI. As a logical outcome of this policy, Monroe Telephone Company uses neither opt-in nor opt-out approval from customers with regard to any marketing.

Contact the President if you are uncertain as to the type of information you can use in marketing services to customers.

CUSTOMER NOTICE AT INITIATION OF SERVICE

Customers are informed during the initiation of service with Monroe Telephone Company that their CPNI data is not used for marketing purposes. Customers receive annual reminders of this CPNI policy.

CUSTOMER NOTICE

Adequate notice with respect to customer CPNI rights and Monroe Telephone Company's duty to protect CPNI is provided in Monroe Telephone Company's telephone directory. In addition, a CPNI notice is printed periodically on the customer's billing statement.

Release of Call Detail Information

Monroe Telephone Company will release call detail information only if certain specific requirements have been met:

(A) Customer-Initiated Telephone Inquiries: A correct password that matches what is on file will be required before information may be provided. If the customer does not provide the correct password, Monroe Telephone Company will only release the requested data via a USPS mailing to the address of record for the account or by a call to the number of record.

(B) In person visits to business office: The Company requires that the customer present valid photo identification.

(C) Online access to customer records: A password is required. Currently Monroe Telephone Company does not offer this feature.

CUSTOMER INITIATED TELEPHONE ACCOUNT ACCESS

Release of any CPNI information requested by the customer via a telephone call is prohibited except when:

- the requesting individual provides the password of record; or
- the information will be sent via mail USPS to the customer's address of record; or
- Monroe Telephone Company will call the telephone number of record and disclose the call detail information.

If the customer has forgotten their password or does not have a password established, Monroe Telephone Company can proceed with routine customer care procedures if the customer can provide all of the call detail information. Monroe Telephone Company will not disclose any call detail other than the information the customer disclosed during that particular contact.

RETAIL LOCATION ACCOUNT ACCESS

Customers must have a valid, government issued photo identification, such as a driver's license, passport, or comparable ID to obtain CPNI information.

ON-LINE ACCOUNT ACCESS

At the present time Monroe Telephone Company does not offer on-line account access.

Monroe Telephone Company will require an on-line password to protect on-line access to CPNI, when this feature becomes available.

Monroe Telephone Company will authenticate both new and existing customers seeking on-line access to their CPNI.

Monroe Telephone Company will reinitialize existing passwords for on-line access but will NOT base on-line access on readily available biographical or account information. This procedure will relate to all customer information, not just call detail.

On-line access to CPNI will be blocked after three (3) unsuccessful attempts to log on.

Monroe Telephone Company will not determine the specifics (length; case-sensitive; mix of numeral, letter or symbols) of customer passwords.

NOTIFICATION OF ACCOUNT CHANGES

Monroe Telephone Company will notify any customer immediately of any account changes including password, customer response to company designed back-up means of authentication, on-line account, address of record, and any other record that may be created or changed. This notification will be through a voicemail, or text message to the telephone number of record or by USPS mail to the address of record as it was prior to the change.

New customers are exempt from this notification at service initiation.

PROCEDURES TO PROTECT AGAINST PRETEXTING

Pretexting is the practice of pretending to be a particular customer or other authorized person in order to obtain access to that customer's call detail or other private communications record. The Company has employed the above procedures and safeguards in order to achieve reasonable measures designed to discover and protect against pretexting.

Monroe Telephone Company will notify the FCC in writing within five (5) days of any instance when the policies did not work properly.

Annual Certification

Monroe Telephone Company will certify annually compliance to the CPNI rules. This certification will be filed with the FCC and will be made publicly available by request to the local commercial office.

Monroe Telephone Company will file an annual certificate even though CPNI is not used for marketing purposes.

Monroe Telephone Company's annual certification will be signed by an officer as an agent of Monroe Telephone Company, stating that they have personal knowledge the company has established operating procedures that are adequate to comply with the FCC CPNI rules.

In addition to the annual certification, Monroe Telephone Company will provide an accompanying statement explaining how the company's procedures ensure the company is or is not in compliance with the FCC's CPNI rules. In the explanation, Monroe Telephone Company will include:

- The training employees receive to protect CPNI.
- The disciplinary process applicable to improper disclosure of CPNI.
- Other measures relevant to demonstrate compliance with the FCC's CPNI rules.

Notice of Unauthorized Disclosure of CPNI

Monroe Telephone Company is required by FCC rules to notify law enforcement of any CPNI breaches no later than seven (7) days after a reasonable determination of a breach has occurred. Monroe Telephone Company will send an electronic notification through the central reporting facility to the United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI). This notification will include a description of the CPNI that was disclosed, how the breach was discovered, an analysis of the sensitivity of the breached CPNI, and any corrective measures taken to prevent recurrence of such breach.

Responsibility to notify USSS and FBI has been assigned to John Dillard President or his designee.

NOTIFICATION OF CPNI SECURITY BREACHES

- (1) *Notification of law enforcement agencies.* Monroe Telephone Company will notify law enforcement of a breach of its customers' CPNI as stated in this section of Monroe Telephone Company's CPNI manual. Monroe Telephone Company will not notify any of

its customers or disclose the breach publicly, whether voluntarily or under state or local law or these rules, until it has completed the process of notifying law enforcement as required and spelled out below.

(2) *Limitations.* As soon as practicable, but in no event later than seven (7) business days, after reasonable determination of the breach, Monroe Telephone Company shall electronically notify the **United States Secret Service (USSS) and the Federal Bureau of Investigation (FBI)** through a central reporting facility. This will be done through the FCC's link to the reporting facility at <http://www.fcc.gov/eb/cpni>.

- a) Notwithstanding any state law to the contrary, Monroe Telephone Company shall not notify customers or disclose the breach to the public until seven (7) full business days have passed after notification to the USSS and the FBI except as in the following two parts of this section.
- b) If Monroe Telephone Company believes that there is an extraordinarily urgent need to notify any class of affected customers sooner than otherwise allowed under the above paragraph of this section, in order to avoid immediate and irreparable harm, it shall so indicate in its notification and may proceed to immediately notify its affected customers only after consultation with the relevant investigating agency. Monroe Telephone Company shall cooperate with the relevant investigating agency's request to minimize any adverse effects of such customer notification.
- c) If the relevant investigating agency determines that public disclosure or notice to customers would impede or compromise an ongoing or potential criminal investigation or national security, such agency may direct Monroe Telephone Company not to disclose or notify for an initial period of up to thirty (30) days. Such period may be extended by the agency as reasonably necessary in the judgment of the agency. If such direction is given, the agency shall notify Monroe Telephone Company when it appears the public disclosure or notice to affected customers will no longer impede or compromise a criminal investigation or national security. The agency shall provide in writing its initial direction to Monroe Telephone Company, any subsequent extension, and any notification that notice will no longer impede or compromise a criminal investigation or national security and such writing shall be contemporaneously logged on the same reporting facility that contains records of notifications filed by carriers.

- (3) *Customer Notification.* After Monroe Telephone Company has completed the process of notifying law enforcement as listed above, it shall notify its customers of a breach of those customers' CPNI.
- (4) *Recordkeeping.* Monroe Telephone Company will maintain a record, electronically or in some other manner, of any breaches discovered, notifications made to the USSS and the FBI as defined in the above section of this manual, and all notifications made to customers. This record must include, if available:
- a) Dates of discovery and notification.
 - b) A detailed description of the CPNI that was the subject of the breach.
 - c) The circumstances of the breach.
 - d) Monroe Telephone Company will retain the record for a minimum of 2 years.
- (5) *Definitions.* As used in this section, a "breach" has occurred when a person, without authorization or exceeding authorization, has intentionally gained access to, used, or disclosed CPNI.
- (6) *Supersede.* This section does not supersede any statute, regulation, order, or interpretation in any State, except to the extent that such statute, regulation, order, or interpretation is inconsistent with the provisions of this section, and then only to the extent of the inconsistency.

SAFEGUARDS BY MONROE TELEPHONE COMPANY

CUSTOMER RECORDS

Customer service records will clearly establish customer CPNI approval. Record of this approval will be kept for a minimum of one (1) year. The record is designed by Monroe Telephone Company's service bureau.

All personnel of Monroe Telephone Company will be trained annually or upon commencement of employment regarding CPNI policies. These policies include when the employee is authorized to use and when they are NOT authorized to use CPNI. Any infractions of Monroe Telephone Company CPNI policies will be reported to the President and a record will be made of the infraction(s) and the disciplinary steps taken.

Discipline for infractions of the policies will be in adherence to the current discipline policy stated in the Monroe Telephone Company Employee Handbook. Discipline may vary from written discipline to termination, depending on the severity of the breach.

Secrecy of Communications

COMMUNICATIONS of any type which is transmitted through the facilities of the Company is the personal property of our customer. It is the right of every customer using our services to the substance, content, or nature of any telephone conversation or communications which we handle for our customer, or the fact that there has been a conversation or communication, is not to be divulged.

An employee may not use for his benefit, or for that of others, any information derived from any conversation or communication by a customer, or from records concerning a customer

Unauthorized persons are not to be permitted to listen to or view any communication handled. Employees must not monitor any connection more than is necessary for its proper supervision. Information regarding the equipment, trunks, circuits, cables, the use of facilities, credit cards, non-published numbers, computer records of calls must not be given to any unauthorized person.

Secrecy of communication is a fundamental policy of the Company and is protected by Federal and State Laws which impose severe penalties upon any person who violates this secrecy.

Any activity of the customer either with Monroe Telephone staff or over the facilities of Monroe Telephone Company is proprietary to the customer and shall be treated as such.

Violations of secrecy of communications are punishable by termination and may expose the violators to criminal and civil liabilities.

INTERFACE WITH CALEA COMPLIANCE

In order to comply with certain Communications Assistance for Law Enforcement Agencies (CALEA) rules, Monroe Telephone Company has engaged the services of a trusted third party provider. This third party provider is involved in the event of a request for certain types of surveillance activities by Law Enforcement Agencies (LEAs).

Monroe Telephone Company has added the following addendum to its third party provider CALEA contract:

Whereas Monroe Telephone Company is required by law and its company policies to protect the privacy and security of the information regarding its customers,

To the extent that Intelleg, in rendering services for Monroe Telephone Company receives customer proprietary network information, as that term is defined under 47 U.S.C. Section 222 and interpreted by the FCC ("CPNI"), Intelleg shall maintain the confidentiality of such CPNI according to the policies and procedures implemented by Monroe Telephone Company. Intelleg shall promptly delete from its records any CPNI that is received by Intelleg which is not delivered to an LEA pursuant to a lawfully authorized intercept request."

INTERFACE WITH CONTRACTORS

From time to time, Monroe Telephone Company has occasion to utilize contractors for specific projects needed for the conduct of its business. Monroe Telephone Company requires all its contractors to include the following language in all agreements with Monroe Telephone Company:

Whereas Monroe Telephone Company is required by law and its company policies to protect the privacy and security of the information regarding its customers; to the extent that [Name of Contractor], in rendering services for Monroe Telephone Company receives customer proprietary network information, as that term is defined under 47 U.S.C. Section 222 and interpreted by the FCC ("CPNI"), [Name of Contractor] shall maintain the confidentiality of such CPNI according to the policies and procedures implemented by Monroe Telephone Company. [Name of Contractor] shall promptly delete from its records any CPNI that is received by [Name of Contractor] in its engagement with Monroe Telephone Company.

TRAINING OF EMPLOYEES

EMPLOYEE TRAINING

The company provides training to employees on the proper use and disclosure of CPNI. The company also provides written documentation of CPNI policy on the company's internal website.

Included as a part of the employee training is the need to communicate to company employees that the customer is provided the opportunity to restrict company or affiliate use of CPNI data by calling a designated telephone number. The customer decision to "opt-out" of CPNI use WILL NOT affect our company's provision of any current customer services.

Annual training and with each new employee company specific CPNI training will be provided and documentation of attendance will be kept on file.

ANNUAL REVIEW BY COMPANY MANAGEMENT

Monroe Telephone Company treats customer privacy as a serious issue. Monroe Telephone Company is proud of its long history of reliable, trustworthy service and is vigilant in the steps that will be taken to ensure customer privacy. Accordingly Monroe Telephone Company policy requires this CPNI Policy Manual to be reviewed on an annual basis. This review will be conducted during the first quarter of each calendar year.

The President's annual review will include, but may not be limited to; a review with GVNW Consulting, Inc. and a review with the Board of Directors.

SIGNATURE PAGE

This manual was reviewed by _____ on _____.
(Name of Employee) (date)

I have read and understand the CPNI compliance policy of Monroe Telephone Company.

(Signature of Employee)

(This signature page is to be detached from this manual and kept on file by the President for a period of not less than five (5) years.)